

1 Joseph R. Johnson, Esq.  
2 Babbitt & Johnson, P.A.  
3 Suite 100  
4 1641 Worthington Road  
5 West Palm Beach, FL 33409  
6 Fla. Bar No: 372250  
7 (561) 684-2500 (fax)  
8 [jjohnson@babbitt-johnson.com](mailto:jjohnson@babbitt-johnson.com)  
9 (561) 684-2500

7 Attorney for Plaintiff, Clifford Falls, Jr.,  
8 and Nancy June Falls

9  
10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ARIZONA

12  
13 IN RE: BARD IVC FILTERS  
14 PRODUCTS LIABILITY LITIGATION

Case No: 2:15-MD-02641-DGC

15  
16  
17 This Document Relates to Plaintiffs:

18 CLIFFORD FALLS, JR. and  
19 NANCY JUNE FALLS

Civil Case No: 2:16-cv-02345-DGC

20  
21  
22 **STIPULATION FOR DISMISSAL WITHOUT PREJUDICE**

23  
24 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs  
25 CLIFFORD FALLS, JR. and NANCY JUNE FALLS and Defendants, C. R. BARD,  
26 INC., and BARD PERIPHERAL VASCULAR, INC., through their undersigned counsel,  
27 that the above-captioned action is voluntarily dismissed, without prejudice, pursuant to  
28

1 Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and without costs or fees to any party.

2 Dated this 5th day of October, 2017.

3  
4  
5 /s/ Joseph R. Johnson

6 Joseph R. Johnson, Fla Bar #372250  
7 Attorneys for Plaintiffs, Clifford Falls, Jr., and Nancy  
8 June Falls

9 /s/ Richard B. North, Jr.

10 Richard B. North, Jr.  
11 Attorneys for Defendants, C.R. Bard, Inc., and Bard  
12 Peripheral Vascular, Inc.

13  
14  
15  
16 CERTIFICATE OF SERVICE

17 I hereby certify that on this 5th day of October, 2017, I electronically transmitted  
18 the attached document to the Clerk's Office using the CM/ECF System for filing and  
19 transmittal of a Notice of Electronic Filing.  
20

21  
22 /s/ Joseph R. Johnson

23 JOSEPH R. JOHNSON  
24  
25  
26  
27  
28